

USNRC REC'D
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August 10, 1979
L-79-222

Mr. C. E. Murphy, Chief
Reactor Construction and Engineering Support Branch
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 3100
Atlanta, Georgia 30303

Dear Mr. Murphy:

Re: RII:NE
50-389/79-07

Per conversations with members of your staff, Florida Power and Light Company herewith submits a supplemental response to the subject inspection report. As indicated in the attachment, this response is intended to clarify and supersede portions of our previous response submitted on July 16, 1979, FPL letter L-79-192.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

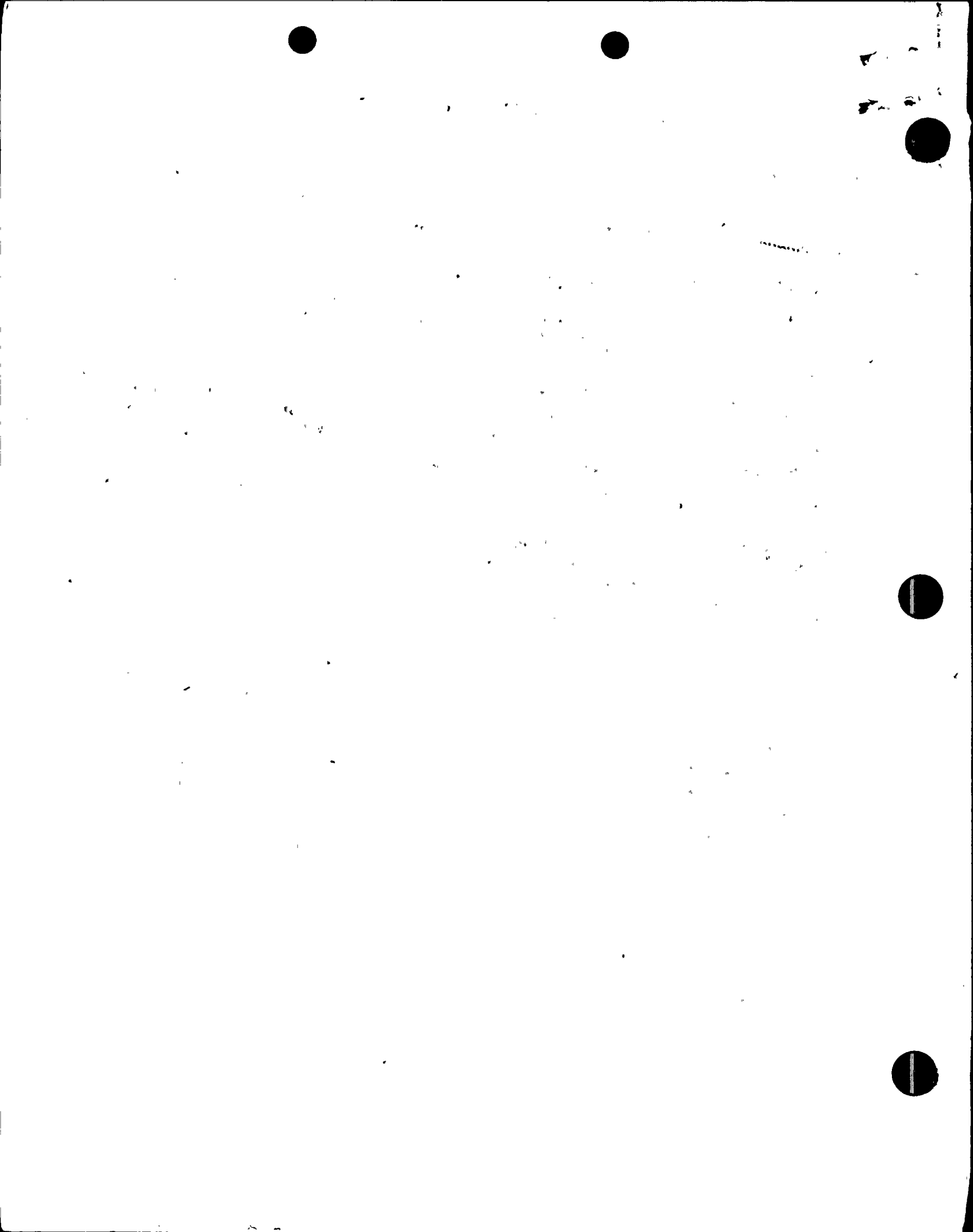
REU/MV/dlh

Attachment

cc: James P. O'Reilly, Office of Inspection and Enforcement
Harold F. Reis, Esquire

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ATTACHMENT

R11:NE
50-389/79-07

Per your request Florida Power & Light has issued a supplemental response to this inspection report as follows:

- A. Deficiency: Incomplete Procedure Qualification Records. During his review of Procedure Qualification Records, the inspector noted that where a combination of weld processes were involved, the weld metal thickness deposited by each process was not specified.

Supplemental Response: The last paragraph of item A in the response submitted July 16, 1979 by FPL letter L-79-192 is deleted and replaced with the following: For welding procedure qualification testing previously performed at St. Lucie Unit 2 where a combination of processes was used, the deposited weld metal thickness for each process shall be estimated, based upon available records of the number of layers deposited using each process. In the future, the deposited weld metal thickness for each process used will be measured and recorded.

- B. Infraction: Instructions, Procedures and Drawings - Failure to follow procedure. The inspector noted that radiographs of welder performance qualification test coupons were not being appropriately identified and the acceptable/rejectable type indications found in the weld were not being recorded on the appropriate form.

Supplemental Response: Florida Power and Light recognizes that our response concerning the recording of acceptable/rejectable type indications may not have been clear. Therefore, please delete in its entirety the second paragraph of Item B in the response submitted July 16, 1979 by FPL letter L-79-192 and substitute the following: We have reviewed the requirements for the recording of indications as delineated by our QI 9.3 and compared these to the requirements of ASME Code, and have concluded that a code clarification is required. Accordingly, we are persuing this with the ASME. However, in the interim we will revise our QI 9.3 to require the recording of all acceptable/rejectable type indications found in welds where the Radiographic Film is not retained. Subsequent revisions to this QI will be based upon clarifications received from ASME.

